

# **Exhibit 18**



# TN Money Transmitter License Amendment Checklist (Company)

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## CHECKLIST SECTIONS

- [General Information](#)
- [Amendments](#)

## GENERAL INFORMATION

### Instructions

When making changes to your record in NMLS, the Tennessee Department of Financial Institutions requires advance notification for some changes. For other changes, Tennessee does not require advance notice. For these, make the changes in NMLS as of the effective date and submit supporting documentation as instructed. See the checklist below for details.

### Uploading Agency-Specific Documents

If you are required to upload documents to NMLS for an Advance Change Notice (ACN), select “Advance Change Notice” for the document type in the NMLS Document Uploads section. If you are required to upload documents for an amendment that doesn’t require ACN, select the applicable document type in the NMLS Document Uploads section.

**Note:** Use the recommended filing naming convention found on the [Document Upload Descriptions and Examples](#).

### Helpful Resources

- [Amendments & Advance Change Notice](#)
- [Document Uploads Quick Guide](#)
- [Document Upload Descriptions and Examples](#)

### Agency Contact Information

Contact Tennessee Department of Financial Institutions, Compliance Division licensing staff by phone at (615) 253-6714 or send your questions via email to [tdfi.licensing@tn.gov](mailto:tdfi.licensing@tn.gov) for additional assistance.

*For U.S. Postal Service and/or Overnight Delivery:*  
*Tennessee Department of Financial Institutions*  
*Compliance Division*  
*Tennessee Tower, 26<sup>th</sup> Floor*  
*312 Rosa L. Parks Avenue*  
*Nashville, TN 37243*

THE APPLICANT/LICENSEE IS FULLY RESPONSIBLE FOR ALL OF THE REQUIREMENTS OF THE LICENSE FOR WHICH THEY ARE APPLYING. THE AGENCY SPECIFIC REQUIREMENTS CONTAINED HEREIN ARE FOR GUIDANCE ONLY TO FACILITATE APPLICATION THROUGH NMLS. SHOULD YOU HAVE QUESTIONS, PLEASE CONSULT LEGAL COUNSEL.

## AMENDMENTS

- [Change of Legal Name](#)
- [Change of Main Address](#)
- [Addition or Modification of Other Trade Name](#)
- [Deletion of Other Trade Name](#)
- [Change of Legal Status](#)
- [Addition or Modification of Affiliates/Subsidiaries](#)
- [Addition or Modification of Direct Owners/Executive Officers](#)
- [Addition or Modification of Indirect Owners](#)
- [Addition or Modification of Qualifying Individuals](#)
- [Change of Disclosure Question\(s\)](#)

**Note:** Information uploaded or filed in NMLS will not be viewable to the agency until the filing has been attested to and submitted through NMLS. Agency-specific requirements that should be emailed or mailed to the agency on the checklist below must be received with the appropriate checklist within five (5) business days of the electronic submission of your filing through NMLS.

Complete	TN Money Transmitter License Change of Legal Name Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Legal Name:</b> Submit an amendment for a change of Legal Name through the Company Form (MU1) in NMLS.	NMLS
Note	<b>Change of Legal Name Fee:</b> \$0 per license Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	<p><b>Surety Bond Rider:</b> Licensees may submit their surety bond to Tennessee in one of the ways listed below.</p> <ol style="list-style-type: none"> <li>1. <b><i>If you HAVE converted to the Electronic Surety Bond</i></b>, contact the surety bond producer to inform them of the change and effective date so the producer can initiate the Surety Bond Rider Process in NMLS. Visit the <a href="#">ESB for NMLS Licensees page</a> of the NMLS Resource Center for more information about the Electronic Surety Bond process.</li> </ol> <p><b>Note:</b> Pursuant to the adoption of the Electronic Surety Bond (ESB) on June 1, 2019, you will be required to convert your existing paper Surety Bond to NMLS via the submission of an ESB by December 31, 2019. See the <a href="#">ESB Adoption Table</a> and the <a href="#">ESB for NMLS Licensees page</a> of the NMLS Recourse Center for more information.</p> <ol style="list-style-type: none"> <li>2. <b><i>If you have NOT converted to the Electronic Surety Bond</i></b>, upload the Surety Bond Rider that reflects the change of name in NMLS under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1) AND mail the original copy to the address listed above. The name of the principal insured on the bond must match exactly the full legal name of applicant, including any Other Trade Names.</li> </ol>	<p><b>Electronic Surety Bond in NMLS</b></p> <p><b>Or;</b></p> <p><b>Upload in NMLS:</b> under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1). This document should be named <i>[License Type] Surety Bond</i>.</p> <p><b>AND</b></p> <p><b>Mail to the Tennessee Department of Financial Institutions</b></p>

Complete	TN Money Transmitter License Change of Main Address Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Main Address:</b> Submit an amendment for a change of Main (Corporate) Address through the Company Form (MU1) in NMLS.	NMLS
Note	<b>Change of Main Address:</b> \$0 per license Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A

Complete	TN Money Transmitter License Change of Main Address Amendment Items	Submitted via...
<input type="checkbox"/>	<p><b>Surety Bond Rider:</b> Licensees may submit their surety bond to Tennessee in one of the ways listed below.</p> <ol style="list-style-type: none"> <li>1. <b><i>If you HAVE converted to the Electronic Surety Bond</i></b>, no further action is required to process this change.</li> <li>2. <b><i>If you have NOT converted to the Electronic Surety Bond</i></b>, upload the Surety Bond Rider that reflects the change of address in NMLS under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1) AND mail the original copy to the address listed above.</li> </ol> <p><b>Note:</b> Pursuant to the adoption of the Electronic Surety Bond (ESB) on June 1, 2019, you will be required to convert your existing paper Surety Bond to NMLS via the submission of an ESB by December 31, 2019. See the <a href="#">ESB Adoption Table</a> and the <a href="#">ESB for NMLS Licensees page</a> of the NMLS Recourse Center for more information.</p>	<p><b>Upload in NMLS:</b> under the Document Type <u>Surety Bond</u> in the <i>Document Uploads</i> section of the Company Form (MU1). This document should be named <i>[License Type] Surety Bond</i>.</p> <p><b>AND</b></p> <p><b>Mail to the Tennessee Department of Financial Institutions</b></p>

Complete	TN Money Transmitter License Addition or Modification of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	<p><b>Addition or Modification of Other Trade Name:</b> Submit an amendment for an addition of or change to an Other Trade Name through the Company Form (MU1) in NMLS.</p>	NMLS
Note	<p><b>Addition of Other Trade Name</b> \$0 per license.</p> <p>Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.</p>	N/A

Complete	TN Money Transmitter License Deletion of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	<p><b>Deletion of Other Trade Name:</b> Submit an amendment for deletion of an Other Trade Name through the Company Form (MU1) in NMLS.</p> <p>If deleting an Other Trade Name, this name must be removed from the <i>Other Trade Names</i> section of the Company Form (MU1).</p>	NMLS

Complete	TN Money Transmitter License Change of Legal Status Amendment Items	Submitted via...
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**Note:** In many cases, a change to the Fiscal Year End, Legal Status, and State or Date of Formation indicates a new entity has been formed and a new NMLS record is required. This includes the creation of a new NMLS account and submission of a new Company Form (MU1).

<input type="checkbox"/>	<b>Change of Legal Status:</b> Submit an amendment for a change in Legal Status within the Company Form (MU1) in NMLS.	NMLS
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Complete	TN Money Transmitter License Addition or Modification of Affiliates/Subsidiaries Amendment Items	Submitted via...
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<input type="checkbox"/>	<b>Addition or Modification of Affiliates/Subsidiaries:</b> Submit an amendment for an addition or change in Affiliates/Subsidiaries within the Company Form (MU1) in NMLS.	NMLS
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Complete	TN Money Transmitter License Addition or Modification of Direct Owners/Executive Officers Amendment Items	Submitted via...
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<input type="checkbox"/>	<p><b>Addition or Modification of Direct Owners/Executive Officers:</b> Submit an ACN for an addition or change in Direct Owner/Executive Officers within the Company Form (MU1) in NMLS.</p> <p><b>If such a change or modification would be considered a change in “Control” as defined by Tennessee Code Annotated Section 45-7-203(4):</b> Prior notice must be given for this change. In the case of a publicly traded company, notification may be made within fifteen (15) days of a change or acquisition of control of licensee.</p> <p><b>Note:</b> Control Persons must also be reported on the Individual Form (MU2).</p>	NMLS
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<input type="checkbox"/>	<p><b>Business Plan:</b> <i>Required for ACN of Addition or Modification of Direct Owners if Such Change or Modification Would be Considered a Change in “Control” as Defined by Tennessee Code Annotated Section 45-7-203(4):</i></p> <p>Upload a description of any changes to the business plan or operations that are anticipated as a result of the potential change of control. Additionally, please note any anticipated changes to management. Such changes may include, but are not limited to:</p>	<p><b>Upload in NMLS:</b> under the Document Type <u>Advance Change Notice</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
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Complete	<b>TN Money Transmitter License</b> <b>Addition or Modification of Direct Owners/Executive Officers</b> <b>Amendment Items</b>	Submitted via...
	<ul style="list-style-type: none"> <li>• Changes in products or services offered</li> <li>• New geographic markets</li> <li>• New target customers</li> </ul>	
Note	<b>Credit Report:</b> Credit Reports and authorizations for credit report through NMLS are not required.	N/A
Note	<b>MU2 Individual FBI Criminal Background Check Not Required Through NMLS:</b> Direct Owners and Executive Officers are NOT required to authorize a FBI criminal background check (CBC) through NMLS.	N/A

Complete	TN Money Transmitter License Addition or Modification of Indirect Owners Amendment Items	Submitted via...
<input type="checkbox"/>	<p><b>Addition or Modification of Indirect Owners:</b> Submit an amendment for an addition or change in Indirect Owners within the Company Form (MU1) in NMLS.</p> <p><b>If such a change or modification would be considered a change in “Control” as defined by Tennessee Code Annotated Section 45-7-203(4):</b> Prior notice must be given for this change. In the case of a publicly traded company, notification may be made within fifteen (15) days of a change or acquisition of control of licensee.</p> <p><b>Note:</b> Control Persons must also be reported on the Individual Form (MU2).</p>	NMLS
<input type="checkbox"/>	<p><b>Business Plan:</b> <i>Required for ACN of Addition or Modification of Indirect Owners if Such Change or Modification Would be Considered a Change in “Control” as Defined by Tennessee Code Annotated Section 45-7-203(4):</i></p> <p>Upload a description of any changes to the business plan or operations that are anticipated as a result of the potential change of control. Additionally, please note any anticipated changes to management. Such changes may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Changes in products or services offered</li> <li>• New geographic markets</li> <li>• New target customers</li> </ul>	<p><b>Upload in NMLS:</b> under the Document Type <u>Advance Change Notice</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
Note	<b>Credit Report:</b> Credit Reports and authorizations for credit report through NMLS are not required.	N/A
Note	<b>MU2 Individual FBI Criminal Background Check Not Required Through NMLS:</b> Indirect Owners are NOT required to authorize a FBI criminal background check (CBC) through NMLS.	N/A

Complete	TN Money Transmitter License Addition or Modification of Qualifying Individual Amendment Items	Submitted via...
<input type="checkbox"/>	<p><b>Addition or Modification of Qualifying Individual:</b> Submit an amendment for an addition or change in Qualifying Individuals within the Company Form (MU1) in NMLS.</p>	NMLS
Note	<p><b>Change of Qualifying Individual:</b> \$0 per license</p> <p>Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.</p>	N/A



Complete	TN Money Transmitter License Addition or Modification of Qualifying Individual Amendment Items	Submitted via...
Note	<b>Credit Report:</b> Credit Reports and authorizations for credit report through NMLS are not required.	N/A
Note	<b>MU2 Individual FBI Criminal Background Check Not Required Through NMLS:</b> Qualifying Individuals are NOT required to authorize a FBI criminal background check (CBC) through NMLS.	N/A

Complete	TN Money Transmitter License Change of Disclosure Question(s) Amendment Items	Submitted via...
<input type="checkbox"/>	<b>Change of Disclosure Question(s):</b> Submit an amendment for a change to Disclosure Question response(s) through the Company Form (MU1) in NMLS.	NMLS
<input type="checkbox"/>	<b>Changing a Response from No to Yes:</b> Provide a complete and detailed explanation and document upload for each response that changes from “No” to “Yes” for company or each control person.  See the <a href="#">Company Disclosure Explanations Quick Guide</a> for instructions.	<b>Upload in NMLS</b> in the <i>Disclosure Explanations</i> section of the Company Form (MU1) or Individual Form (MU2).